

To whom it may concern-

Thank you for the opportunity to testify. We, at Van Dyk Recycling Solutions, a Connecticut company based in Norwalk, CT, do not support HB 6664 as we believe EPR for PPP is wholly unnecessary in Connecticut and may serve to do more damage than good to Connecticut's recycling system. VDRS has been involved in Material Recovery Facility design and construction for singlestream facilities across North America since 1984. We work closely with private recyclers and municipalities to stay up to date with changes within the marketplace and provide the most innovative technology available to ensure the highest recovery and quality of recycled material possible. We've built plants in the largest cities of North America including New York City, Toronto, Chicago, Houston, Dallas, and others. We are currently in the process of modernizing MRF's in CT and are excited to contribute to recycling improvements within our home state.

From the perspective of a recycling plant designer and builder in both the USA and Canada, I can see where EPR legislation might have a place in the industry. For instance, states or provinces where the recycling infrastructure and programs are widely spread out geographically sometimes causes for inefficiencies and waste. For example, there are over 45 material recovery facilities (MRFs) in the province of Ontario alone and consolidation is important. Many of these MRFs require updating and retrofits but can't do it because they are municipally-owned or lack the tonnages to justify this investment.

Let me be very clear -- Connecticut does not fall into that category and does not face the challenges that Ontario or, for that matter, British Columbia faced. Connecticut is a densely populated state with relatively few, but large MRFs. These MRFs are efficient and have the capacity to process all of Connecticut municipalities' recyclables. The various private entities that own and operate these facilities have, from the inception of curbside recycling, invested in their MRFs and several are currently in the process of making significant financial investment to further modernize and further ensure the greatest recovery and highest purity of recyclables possible. Connecticut already has a top notch recycling system and that system is only going to improve in the near future as current projects come online.

Passing an EPR for consumer packaging bill will be a shift to an entirely new program, but will not help move Connecticut forward. Instead, it will create instability and insecurity in the marketplace. I've personally seen the situation in Ontario where the stewardship programs have taken years to develop and halted further progress and investment at the municipal level and by MRF operators due to uncertainties for the future.

Private haulers, MRF operators and other recyclers in Connecticut have continually moved the ball forward in terms of improving the State's recycling system. Even as recently as the last five years, they have tackled global issues such as the China National Sword and COVID-related supply chain issues by adeptly adapting to changing market conditions, investing in technological advances, and working with new end markets. While recycling programs in many other jurisdictions in the US and Canada were being abandoned or scaled back, recycling programs in Connecticut remained strong and weathered the storm. The haulers and MRF operators in Connecticut are among the best in the nation and have, through it all, been able to deliver efficient and effective recycling services to the State.

The proof is now showcased at the Murphy Road Recycling MRF in Berlin, CT. The plant is operating at high efficiencies making high quality sellable products across the board. In fact, many companies from

EPR driven provinces in Canada have visited the facility to take notes on how to improve their own facilities. Haulers, processors, end market buyers, etc...have been touring the plant as it truly is one America's most effective, high capacity, producing MRF's.

VDRS does not see a need for EPR for consumer packaging in Connecticut and is wary of such program's adverse impact on continued investment in the State's recycling infrastructure. For these reasons, VDRS opposes HB 6664 and ask that you do as well.

Sincerely,

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